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July 31, 2023

BY EMAIL AND ECF

The Honorable Judge Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Morrow-Wu et al
23 Cr. 90 (AKH)

Dear Judge Hellerstein:

I write to respectfully request that the Court make two modifications to the conditions of Mr. Matthew-Wu's bond. First, I request that Mr. Morrow-Wu be permitted to travel to the Southern District of New York for medical appointments. Second, I request that he be permitted to stay for one night in New York City on occasions when he travels from the Eastern District of Tennessee to the Southern District of New York. Pretrial Services and the Government oppose these requests, but there is good cause to grant them.

On June 7, 2023, your Honor ordered Mr. Wu released to home detention at his sister's residence in Oneida, Tennessee subject to a \$75,000 personal recognizance bond secured by his sister's vehicle, cosigned by two financially responsible persons, Pretrial supervision, travel restricted to the Eastern District of Tennessee and Southern Eastern Districts of New York, and the surrender of travel documents with no new applications. In the two months since, Mr. Wu has remained compliant with all conditions of his release.

Pretrial Services and the Government oppose Mr. Wu's request to travel to New York for medical appointments on the grounds that he can seek medical treatment in Tennessee. However, Mr. Wu lives in a small town, Oneida, Tennessee, with a population of 3,787. He has not been able to locate a local provider that will prescribe him the specific medications he needs, including testosterone. Mr. Wu is also struggling with the lingering impacts of his four-month incarceration at the MDC, which as Your Honor knows was extremely damaging to his health. These health concerns, including his many allergies and the need for a root canal, would be best addressed by his doctors in New York who are familiar with his medical history and specific medical issues.

Pretrial Services and the Government also oppose Mr. Wu's request that his bond be modified to allow him to stay overnight in New York City for visits with counsel, Court, or medical appointments without filing a motion with this Court. It takes Mr. Wu several hours to travel between his residence and New York City. Mr. Wu lives more than 1 hour away from the nearest airport in Knoxville, TN. Flights between Knoxville and New York are at least 2 hours in length. Requiring Mr. Wu to fly to New York, attend to his legal and medical needs and then immediately

Travel as requested is permitted. Def it's choice of medical provider does not realistically add to the chances of flight or present danger to the community.
8-1-23
J.K. Talbot

July 31, 2023

Page 2 of 2

return home the same day is unnecessary and Mr. Wu should not be required to file a motion with the Court in advance of every verified legal or medical visit.

Mr. Wu can report to Pretrial Services upon his arrival in the Southern District of New York, and if requested by Pretrial, be outfitted with a location monitoring device. His sister, Donika Morrow, is willing to accompany him on travel to New York if requested by Pretrial or the Court. As the Court is aware, Ms. Morrow has already been designated as Mr. Wu's Third-Party Custodian. Finally, Mr. Wu would provide Pretrial with his itinerary ahead of time, including his flights and hotel information.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Zawadi S. Baharanyi

Assistant Federal Defender

(917) 612-2753

cc: AUSA Jerry Fang
USPSO Shauna McCullough-Walker

SO ORDERED;



HONORABLE ALVIN K. HELLERSTEIN
United States District Judge